

### **REMARKS/ARGUMENTS**

The non-final Office Action of January 24, 2008, has been carefully reviewed and these remarks are responsive thereto. Claims 3, 6, 11, 15, and 16 are canceled herein. Claims 20 and 21 are new. No new subject matter has been added. Claims 1, 2-5, 7-10, 12-14, and 17-21 are pending upon entry of the present paper. Reconsideration and allowance of the instant application are respectfully requested.

#### ***Rejections Under 35 U.S.C. § 112***

Claims 7-9, 11, 14-16, and 18<sup>1</sup> stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter recited therein. This rejection is traversed.

Claims 11, 15, and 16 have been canceled, rendering the rejection moot as applied to the referenced claims.

Claims 7-9, 14, and 18 have been amended to interrelate essential elements of the invention as defined in the specification.<sup>2</sup> Accordingly, Applicant respectfully requests withdrawal of the rejection as applied to the referenced claims.

#### ***Rejections Under 35 U.S.C. § 102***

Claims 1-11 and 14-19 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. patent no. 6,516,205 to Oguma ("Oguma"). This rejection is traversed.

Amended independent claim 1 recites, among other features, "a device operable as a host device, *the device including: a bus*; a first port, the first port being connected *directly* to the bus; a second port, the second port being connected *directly* to the bus." Oguma fails to teach or suggest the recited features. Instead, Oguma at col. 4, lines 9-28 and Figure 3 describes a portable phone 5 that determines whether a host personal computer 1 is connected and operating as a bus manager; when the host personal

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<sup>1</sup> The enumeration of claims rejected under 35 U.S.C. § 112, second paragraph, on page 2 of the Office Action does not include claims 7, 9, and 14. The Office Action at pages 2-3, however, provides for a discussion of these claims. Applicant presumes for purposes of this paper that claims 7, 9, and 14 were intended to be included in the enumeration; if this assumption is inaccurate, Applicant respectfully requests clarification in the next communication.

<sup>2</sup> See MPEP § 2172.01.

computer 1 is connected and operating as a bus manager, a bus manager circuit 62 in portable phone 5 stops or invalidates a bus manager function and passes signals between the host personal computer 1 and bus peripheral units. Conversely, when the host personal computer 1 is not connected, or when the host personal computer 1 is in a suspended state, bus manager circuit 62 sends a power selection signal 55 to a power supply switching circuit, which serves to supply power to an external device connected to portable phone 5 on a downstream side via an internal power source of portable phone 5. See Oguma at col. 4, lines 9-50 and Figure 3.

The portable phone 5 described in Oguma does not include a bus as required by amended claim 1. See Oguma at Figure 3. As such, claim 1 is allowable for at least this reason.

Oguma at col. 3, lines 48-65, col. 4, lines 9-50 and Figure 3 describes portable phone 5 as including upstream lines D+ 11, D- 12, Vbus 41 and GND 42 and downstream lines D+ 31, D- 32, Vbus 53, and GND 54. Even assuming (without admitting) that the upstream lines could appropriately be analogized to one of the recited first and second ports and the downstream lines could appropriately be analogized to the other of the recited first and second ports, Oguma fails to disclose the upstream lines being directly connected to a bus and the downstream lines being directly connected to the same bus as required by claim 1. As such, since Oguma fails to disclose all of the features recited in claim 1, claim 1 is allowable for at least these additional reasons.

Furthermore, amended claim 1 recites, among other features, "a host module, the host module being connected *directly* to the bus." Even assuming (without admitting) that the bus manager circuit 62 disclosed in Oguma at Figure 3 can appropriately be analogized to the recited host module, bus manager circuit 62 is not directly connected to a bus, much less the same bus that each of the first and second ports are connected to as required by claim 1. Claim 1 is allowable over Oguma for at least these additional reasons.

Applicant submits that one of ordinary skill in the art would appreciate the technical advance provided for by above-noted features as recited in claim 1 over Oguma. Claim 1 provides for direct pass-through capabilities, wherein the recited device may take

on a passive role and allow for direct communication between one or more hosts (e.g., the host externally connected to the bus as recited in claim 1) or non-hosts connected to the recited first and second ports. Examples of these capabilities are demonstrated in the present application with reference to Figures 1 and 3. Referring to Figures 1 and 3, a first USB port 34 is connected directly to a second USB port 39 via a USB bus 40, allowing USB communication between a PC 10 and a mobile telephone 11 without involving an accessory device 12. More specifically, when PC 10 is connected to a USB bus 13, a comparator 21 detects that there is a voltage rise on VBUS and then activates and interrupts a USB host module 19 to reset a USB non-host module 17 of mobile telephone 11 via D+ and D- lines 15 of USB bus 13. Consequently, USB host module 19 causes accessory device 12 to relinquish host status and sends a CTRL inactive to a voltage supply 20 to cease providing a supply voltage for VBUS. Hence, PC 10 is able to assume host status with mobile telephone 11 via bus 13 while accessory device 12 is in a stand-by mode.

One of skill in the art would appreciate that power may be saved in the recited device, because the recited device can simply pass-through signals via the recited bus. Conversely, Oguma at Figure 3 discloses the use of various circuits (e.g., level detecting circuit 61, bus manager circuit 62, hub unit 63, voltage detecting circuit 64 and power supply switching circuit 65) in portable phone 5 to connect a host personal computer 1 on the upstream lines to a third device 6 on the downstream lines; one of skill in the art would appreciate that the various circuits disadvantageously consume/dissipate power. Moreover, the various circuits disadvantageously add to the overall complexity of the portable phone 5 in comparison to the apparatus of claim 1. As such, and in view of the foregoing remarks, claim 1 provides numerous technical advantages in comparison with Oguma.

Claim 17 includes in its recitation a device as in claim 1, and is therefore allowable for at least the same reasons as discussed above with respect to claim 1.

Claim 19 recites features similar to those described above with respect to claim 1. Thus, claim 19 is allowable for at least reasons substantially similar to those discussed with respect to claim 1.

Claims 2-5, 7-10, 14, and 18, which each depend from at least one of claims 1, 17 and 19, are allowable for at least the same reasons as their respective base claims.

***Rejections Under 35 U.S.C. § 103***

Claims 12 and 13 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Oguma. This rejection is traversed below.

Claims 12 and 13 each depend from claim 1, and are allowable for at least the same reasons as claim 1. Moreover, the Office Action at pages 8-9 correctly indicates that Oguma fails to disclose the features recited in each of claims 12 and 13. The Office attempts to remedy the acknowledged deficiencies of Oguma by asserting that it would have been obvious to incorporate the features recited in each of claims 12 and 13. Applicant respectfully requests the Office to provide proof/documentation that demonstrates why it would have been obvious for a skilled artisan to incorporate the recited features into Oguma at the time of the instant invention/application. Pending such proof/documentation, Applicant respectfully submits that claims 12 and 13 are further allowable in view of the advantageous features recited therein.

**CONCLUSION**

All rejections having been addressed, Applicant respectfully submits that the instant application is in condition for allowance, and respectfully solicits prompt notification of the same. However, if for any reason the Examiner believes the application is not in condition for allowance or there are any questions, the Examiner is requested to contact Applicant's undersigned counsel at (202) 824-3160.

Respectfully submitted,

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